November 10, 2025

Luke Coats
Co-Founder & CMO
Clean Connect
Electronic mail: luke@cleanconnect.ai

Via electronic mail

Re: Conditional Approval – CleanConnect Alternative Monitoring Plan for 20.2.50 NMAC

Dear Luke Coats:

This letter serves as a conditional approval of the CleanConnect application for its technology to be used by companies with facilities subject to the *Ozone Precursor Rule* as a pre-approved alternative monitoring technology pursuant to 20.2.50.116.D(2) New Mexico Administrative Code. To be eligible to use this technology in an Alternative Monitoring Plan, any company wishing to use this pre-approved technology at a specific facility must provide advance notice to the New Mexico Environment Department (Department or NMED) in accordance with 20.2.50.116.D(2)(a).

Companies choosing to deploy the CleanConnect LeakFinder alternative monitoring plan must do so in a manner consistent with installation and operating practices included in the CleanConnect LeakFinder Alternative Equipment Leak Monitoring plan provided to NMENV by CleanConnect on May 5, 2025, which includes, but is not limited to the following:

- The CleanConnect LeakFinder alternative monitoring plan must be deployed according to the method described in the CleanConnect LeakFinder System Component-Level Periodic Screening Alternative Test Method (ATM) document dated May 1, 2025.

- Site owner/operators must be notified of any emission events within 10 minutes of detection and confirmation.

- Any equipment components not able to be directly monitored using this method must be clearly identified to site owner/operators so that these components can be monitored using an alternative method.

- The monitoring plan tour configuration must be such that at least 15 valid tours occur over any given 7-day period, and each tour stop is a minimum duration of 2 minutes. If this criterion is not met, the owner/operator must be informed and a Method 21/OGI or other approved alternative method survey performed.

- The system platform must be less than 120 meters away from any component being monitored.

- Only tour stops where the average wind speed is $\leq$ 20 mph are considered valid.

- The OGI camera must not be placed within 80 feet of an active flare or less than 40 feet from storage tanks.

- The LeakFinder system must perform automated hardware checks every minute.

- Users of this method must complete training that includes both hands-on practice and verbal instructions. The users must also pass a User Proficiency Exam by assessing videos and metadata from a variety of different conditions. The training certification is valid for one year only and users must be retrained and certified every year.

- The operator of a facility monitored by a CleanConnect LeakFinder Monitoring System must retain and make available for inspection upon request a copy of this approval letter, historical records up to 5 years prior, and any applicable training/certification documents for monitoring system technicians.

The New Mexico Air Quality Bureau thanks you for your interest in providing this service and for your patience as numerous technical questions were addressed during the application approval process.

Sincerely,

Kerra Roudebush Digitally signed by Kerra Roudebush Date: 2025.11.10 10:47:19 -07'00'

Kerra Roudebush, Air Enforcement Manager
Environmental Protection Compliance and Enforcement Bureau
New Mexico Environment Department